

HARRIS M. MUFSON, *pro hac vice*  
hmufson@gibsondunn.com  
GIBSON, DUNN & CRUTCHER LLP  
200 Park Avenue  
New York, New York 10166-0193  
Telephone: 212.351.4000

MATTHEW D. MCGILL, *pro hac vice*  
mmcgill@gibsondunn.com  
GIBSON, DUNN & CRUTCHER LLP  
1700 M Street, N.W.  
Washington, D.C. 20036-4504  
Telephone: 202.955.8500

ILISSA SAMPLIN, SBN 314018  
isamplin@gibsondunn.com  
GIBSON, DUNN & CRUTCHER LLP  
333 South Grand Avenue  
Los Angeles, California 90071-3197  
Telephone: 213.229.7000

CHRISTINE DEMANA, *pro hac vice*  
cdemana@gibsondunn.com  
GIBSON, DUNN & CRUTCHER LLP  
2001 Ross Avenue, Suite 2100  
Dallas, Texas 75201-2923  
Telephone: 214.698.3100

*Attorneys for Plaintiff*  
*ELECTRIC SOLIDUS, INC. d/b/a SWAN BITCOIN*

**IN THE UNITED STATES DISTRICT COURT**

**FOR THE CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

ELECTRIC SOLIDUS, INC. d/b/a  
SWAN BITCOIN, a Delaware  
corporation,

Plaintiff,

v.

PROTON MANAGEMENT LTD., a  
British Virgin Islands corporation;  
THOMAS PATRICK FURLONG; ILIOS  
CORP., a California corporation;  
MICHAEL ALEXANDER HOLMES;  
RAFAEL DIAS MONTELEONE;  
SANTHIRAN NAIDOO; ENRIQUE  
ROMUALDEZ; and LUCAS  
VASCONCELOS,

Defendants.

Case No. 2:24-cv-8280-MWC-E

**GIBSON, DUNN & CRUTCHER  
LLP'S NOTICE OF MOTION AND  
MOTION TO WITHDRAW AS  
COUNSEL FOR PLAINTIFF  
ELECTRIC SOLIDUS, INC. D/B/A  
SWAN BITCOIN**

Date: January 10, 2025

Time: 1:30 p.m.

Place: Courtroom 6A

Judge: Hon. Michelle Williams Court

Action Filed: September 25, 2024

1 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

2 PLEASE TAKE NOTICE THAT on January 10, 2025 at 1:30 p.m. or as soon  
3 thereafter as may be heard in Courtroom 6A of the above-entitled court, located at 350  
4 West 1st Street, Los Angeles, California 90012, before the Honorable Michelle Williams  
5 Court, district judge, Gibson, Dunn & Crutcher LLP (“Gibson Dunn”) shall and hereby  
6 does seek leave of this Court to withdraw as counsel of record for Plaintiff Electric  
7 Solidus, Inc. d/b/a Swan Bitcoin (“Swan”).

8 This Motion will be made on the grounds that Gibson Dunn and Swan’s attorney-  
9 client relationship has broken down such that Gibson Dunn can no longer represent  
10 Swan, as Swan has filed an action in Los Angeles County Superior Court asserting  
11 claims of breach of fiduciary duty and legal malpractice against Gibson Dunn and has  
12 stated that it will “never” pay Gibson Dunn’s legal fees.

13 In accordance with Local Civil Rules 83-2.3.2 and 83-2.3.4, Gibson Dunn  
14 provided written notice to Swan of Gibson Dunn’s intent to withdraw due to the  
15 complete breakdown of the attorney-client relationship, as well as the consequences of  
16 Swan’s inability to appear *pro se* in this action as an organization.

17 This Motion is made pursuant to Local Civil Rule 83-2.3 *et seq.*, and is based on  
18 this Notice, this Memorandum of Points and Authorities, the accompanying Declaration  
19 of Harris M. Mufson, the accompanying Declaration of Matthew D. McGill, the  
20 accompanying Declaration of Martin A. Hewett, the accompanying Proposed Order, all  
21 the pleadings and papers on file herein, and on such further evidence and argument that  
22 may be presented prior to or at the hearing of this Motion.

1 DATED: November 24, 2024

Respectfully submitted,

2  
3 GIBSON, DUNN & CRUTCHER LLP

4  
5 By: /s/ Ilissa Samplin

6 Ilissa Samplin

7 *Attorneys for Plaintiff*